IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE; DR. ANDREA WESLEY; DR. JOSEPH WESLEY; ROBERT EVANS; GARY FREDERICKS; PAMELA HAMNER; BARBARA FINN; OTHO BARNES; SHIRLINDA ROBERTSON; SANDRA SMITH; DEBORAH HULITT; RODESTA TUMBLIN; DR. KIA JONES; MARCELEAN ARRINGTON; VICTORIA ROBERTSON,

Plaintiffs,

VS.

STATE BOARD OF ELECTION COMMISSIONERS; TATE REEVES, in his official capacity as Governor of Mississippi; LYNN FITCH, in her official capacity as Attorney General of Mississippi; MICHAEL WATSON, in his official capacity as Secretary of State of Mississippi,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE COMMITTEE,

Intervenor-Defendant.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI

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Jul 08 2025

ARTHUR JOHNSTON, CLERK

By: June Coursel, Deputy Clerk

CIVIL ACTION NO. 3:22-cv-734-DPJ-HSO-LHS

PLAINTIFFS' EXHIBIT LIST

	Ex. No.	Document Description	Sponsor	ID.	EVID.
		1	1		
	PTX-001	August 28, 2023 Report of William			1
2-21	0-2024	Cooper, including all exhibits and appendices thereto		1	X
	PTX-002	November 15, 2023 Rebuttal Report of			
4 2		William Cooper, including all exhibits			\sim
2-21	0-2024	and appendices thereto	,		^
	PTX-003	Mississippi Association of Planning			
		and Development Districts – 2022			
		Directory (2002) (2002)			
		(http://mspdds.org/images/2022/2022- Directory.pdf)			
	PTX-004	December 22, 2023 Amended Report			
9 00		of Dr. Lisa Handley, including all			\vee
اله مد	-2024	appendices thereto			^
	PTX-005	August 28, 2023 Report of Dr. Jordan			_
2 26	2024	Ragusa, including all exhibits and			\mathbf{X}
	•	appendices thereto			/
	PTX-006	November 27, 2023 Amended Rebuttal			
2 21	0-2024	Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			X
المرمل	PTX-007	February 5, 2024 Report of Dr. Robert			
0 27		1	Da Robart I I all	V	
2-61-	1024	appendices thereto	De. Robert Luclett	^	
	PTX-008	November 14, 2023 Second Amended			
2 74	2021	Report of Dr. D'Andra Orey, including			Y
مال م	- 2024	all exhibits and appendices thereto			
2-26	PTX-009	November 22, 2023 Responsive Expert Report of Dr. D'Andra Orey,			X
	PTX-010	January 29, 2024 Second Rebuttal			
	1 171 010	Report of Dr. Jordan Ragusa, including			
		all exhibits and appendices thereto			
	PTX-011	Voter File BISG dataset used in Dr.			
		Orey's BISG analysis, named			
	DEX 012	"ms voter file bisg birdie.csv"			
	PTX-012	Ansolabehere, Fraga, and Schaffner			
		(2022). The Current Population Survey Voting and		1	
21	102 1	Registration Supplement Overstates		X	
3-6-1	WLY	Minority Turnout, The Journal of			
		Politics			
		https://www.journals.uchicago.edu/doi			
	DEX. 012	/abs/10.1086/717260			
	PTX-013	February 5, 2024 Report of Dr. Marvin	7	1	
2-29	-1024	King, including all exhibits and appendices thereto	Dr. Mawin King	X	
	•	appendices incivio		* 1	

	Ex. No.	Document Description	Sponsor	ID.	EVID.
	PTX-014	November 15, 2023 Report of Dr.			
2-20	1-1024	Marvin King, including all exhibits and appendices thereto	Dr. Hawin King	X	
	PTX-015	Exhibit 5 to Deposition of Dr. Jordan			
		Ragusa, Old Voters, New Voters, and the Personal Vote: Using Redistricting			
		to Measure the Incumbency			
		Advantage, American Journal of			
		Political Science			
	PTX-016	Exhibit 6 to Deposition of Dr. Jordan			
		Ragusa, Revisiting Majority-Minority Districts and Black Representation,			
		Political Research Quarterly			
	PTX-017	Exhibit 7 to Deposition of Dr. Thomas			
		Brunell, Brunell, Anderson, &			
		Cremona 2008, Descriptive			
		Representation, District Demography, and Attitudes toward Congress Among			
		African Americans, Legislative Studies			
		Quarterly			
	PTX-018	Exhibit 8 to Deposition of Dr. Thomas			
	ющ	Brunell, Soloweij, Martinek, & Brunell 2005, <i>Partisan Politics: The Impact of</i>		\/	
36.		Party in the Confirmation of Minority		X	
		and Female Federal Court Nominees,			
		Party Politics			
	PTX-019	Exhibit 10 to Deposition of Dr.			
		Thomas Brunell, Lublin, Handley, Brunell & Grofman 2019, Minority		,	
2 (0-01	Success in Non-Majority Minority		X	
2-10	2024	Districts: Finding the "Sweet Spot,"		/ \	
		The Journal of Race, Ethnicity, and			
	DTX 020	Politics CD CD			
0.34	PTX-020	Exhibit 16 to Deposition of Dr. Thomas Brunell, Executive Order No.			V
المحالة	-2024	81 (June 11, 1971)			
	PTX-021	Exhibit 23 to Deposition of Dr.			
		Thomas Brunell, Ansolabehere,			V
2-21	-2024	Schaffner, and Luks, Guide to the			
	PTX-022	2020 Cooperative Election Study Exhibit 24 to Deposition of Dr.			1.5
2-21	PTX-022 0-2024	Thomas Brunell, Mississippi Sample			X
		of 2020 Cooperative Election Study			Ť
	DELY 000	Data			
7-21	PTX-023	Exhibit 25 to Deposition of Dr.			X
6-6	my	Thomas Brunell, Mississippi Sample		<u>I</u>	

		Document Description	Sponsor	ID.	EVID.
		of 2020 Cooperative Election Study			
	PTX-024	Data (Coded) Exhibit 26 to Deposition of Dr.			
	1 171 02 1	Thomas Brunell, Mississippi Sample			
2-21	1-2024	of 2020 Cooperative Election Study			X
		Data (Coded and Sorted)			1
	PTX-025	U.S. Census Bureau, Frequently Asked			
		Questions (FAQs) About Voting and			\/
2-20	-2024	Registration,			X
	004	https://www.census.gov/topics/public-			
-	PTX-026	sector/voting/about/faqs.html			
		Clarno v. Fagan, Excerpt of Special Master's Report (Or. Circuit Ct. Nov.			
3-4-6	ory	5, 2021)			
	PTX-027	Clarno v. Fagan, Panel Decision (Or.		<u> </u>	
		Circuit Ct. Nov. 24, 2021)			
	PTX-028	Ohio A. Philip Randolph Institute v.		× 1	
364	m 4	Householder, Op. Excerpt (S.D. Ohio		X	
	•	May 3, 2019)		- (
3-6-7	PTX-029	Common Cause v. Lewis, Op. Excerpt,		X	
• •		(NC Sup. Ct. Sept. 3, 2019)		/\	
	PTX-030	Szeliga v. Lamone, Op. Excerpt (Md. Circuit Ct. Mar. 25, 2022)			
	PTX-031	Expert Report of Dr. Thomas Brunell, <i>Szeliga v. Lamone</i>			
	PTX-032	Lopez v. Abbott, 339 F.Supp.3d 589			
3-6-L	021	(S.D. Tex. 2018) (excerpt)		X	
ا-نهارز	024	, , , , , , , , , , , , , , , , , , , ,		/\	
	PTX-033	Flores v. Town of Islip, 382 F.Supp. 3d		\ \ /	
3-6-1	1024	197 (E.D.N.Y. 2019) (excerpt)		X	
_	•	MAACD C . W.H. D. J. E .		/ \	
	PTX-034	NAACP, Spring Valley Branch v. East Ramapo Central School District, 462		\/	
36-6	1024	F.Supp.3d 368 (S.D.N.Y. 2020)			
_	PTX-035	Alpha Phi Alpha Fraternity, Inc. v.		-	
		Raffensperger, 587 F.Supp.3d 1222		/	
3.6	७४५	(N.D.Ga. 2022) (excerpt)			
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PTX-045	SDT-SJLCRR-001330- Letter from Senator Melanie Sojourner to James F. Ted Booth – March 24, 2022			
PTX-046	Carson, E. A. "Prisoners in 2020 - Statistical Tables." BJS.OJP.Gov. U.S. Department of Justice, https://bjs.ojp.gov/content/pub/pdf/p20st.pdf			
PTX-047	NAACP, History of Lynching in America, https://naacp.org/find-resources/history-explained/history-lynching-america			
PTX-048	Pittman, Ashton. "GOP Mailers Misleadingly Paint Espy as a Criminal." JacksonFreePress.Com. Jackson Free Press, November 2, 2018. Ashton Pittman, "GOP Mailers Misleadingly Paint Espy as a Criminal," Jackson Free Press (Nov. 2, 2018), https://www.jacksonfreepress.com/news/2018/nov/02/gop-mailers-misleadingly-paint-espy-criminal/			
PTX-049	Angelo Dagonel, Soichiro Yamauchi. 2023. "The Geography of Racially Polarized Voting: Calibrating Surveys at the District Level." American Political Science Review https://doi.org/10.1017/S0003055423000436			
PTX-050	Chris Danielson. After Freedom Summer: How Race Realigned Mississippi Politics, 1965-1986. Gainesville: University Press of Florida, 2011, pp.173-188;			

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	PTX-051	McMillen, Neil R. 1989. Dark Journey: Black Mississippians in the Age of Jim Crow. Champaign, Illinois: University of Illinois Press, p. 41-44.			
	PTX-052	Equal Justice Initiative. Lynching in America: Confronting the Legacy of Racial Terror. 3rd Edition. https://lynchinginamerica.eji.org/report/ , pp.30-33, 39-40.			
	PTX-053	002057 – Public Materials from Joint			_
-2(p	2024	Committee Meetings (SDT-SJLCRR-002057-2070)			X
-2b-	PTX-054	Benchmark House Data (SDT- Upchurch-000006) INTENTIONALLY LEFT BLANK			
	PTX-056	"Population of the United States in 1860: Mississippi." 1860 U.S. Census: Statistics of the United States. U.S. Census Bureau. https://www2.census.gov/library/publications/decennial/1860/population/1860-22.pdf, p.270.			
	PTX-057	State of Mississippi. Mississippi Constitution of 1890. https://www.mshistorynow.mdah.ms.g ov/issue/mississippi-constitution-of- 1890-as-originally-adopted.			
	PTX-058	"Population of the United States at Each Census, from 1790 to 1900." In Statistical Abstract of the United States, 1901. 24th ed. Washington: Government Printing Office, 1902, p.7			
	PTX-059	Historical Statistics of the United States, Colonial Times to 1970. Chapter Y, Government, Elections and Politics. "Voter participation in presidential elections by state: 1824 to 1968. Washington: Government Printing Office, 1975, pp. 1067, 1072.			
	PTX-060	Medgar W. Evers. "News and Action." NAACP Mississippi State Office. April 11, 1958. https://www.crmvet.org/docs/5804_na-acp_ms_news.pdf			

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	PTX-061	"Census of Population: 1960." The Eighteenth Decennial Census of the United States. Volume 1: Characteristics of the Population. Part 26: Mississippi. U.S. Department of Commerce.			
		https://www2.census.gov/library/publications/decennial/1960/population-volume-1/37745223v1p26.zip, p.viii; U.S.			
	PTX-062	Frank R. Parker. Black Votes Count: Political Empowerment in Mississippi after 1965. Chapel Hill: University of North Carolina Press, 1990, p.xv, 45, 50			
3-leil	PTX-063	U.S. Department of Justice Civil Rights Division. "Voting Determination Letters for Mississippi." https://www.justice.gov/crt/voting-determination-letters-mississippi			X
	PTX-064	determination-letters-mississippi. Letter, Acting Assistant U.S. Attorney General, Civil Rights Division, James P. Turner to John P. Fox, Esq.,			· · ·
لماري	2024	February 27, 1990. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2100.pdf, pp.1 and 2.			
3-6-	PTX-065	Letter, Assistant U.S. Attorney General, Civil Rights Division, Deval Patrick to Jeffery M. Navarro, December 4, 1995.			X
		https://www.justice.gov/sites/default/fi les/crt/legacy/2014/05/30/MS- 2630.pdf, pp.1, 5.			
3-6	PTX-066	Letter, Assistant U.S. Attorney General, Civil Rights Division, Thomas E. Perez to Kenneth Dreher, Esq., and David Wade, Senior Planner, December 3, 2012.			X
		https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/l_121203_0.pdf, p.2.			
3-0	PTX-067	Isabelle Katz Pinzler, Acting Assistant Attorney General, to Sandra M. Shelson, Special Assistant Attorney General, State of Mississippi,			X

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	https://www.justice.gov/sites/default/fi			
	les/crt/legacy/2014/05/30/MS-			
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PTX-068	World Population Review. "Black			
	Poverty Rate by State [Updated			
	January 2023]."			
	https://worldpopulationreview.com/stat			
	e-rankings/black-poverty-rate-by-state			
PTX-069	Article 8, Mississippi Constitution of			
	1868.			
	https://mshistorynow.mdah.ms.gov/iss			
	ue/mississippi-constitution-of-1868			
PTX-070	"Racial Facts." Jackson Free Press.			
	Jackson Free-Press, Accessed August			
	19, 2023.			
	https://jacksonfreepress.media.clients.e			
	llingtoncms.com/news/documents/201			
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PTX-071	"H.R. 5905." Congress.Gov. House of			
	Representatives, November 5, 2021.			
	https://www.congress.gov/bill/117th-			
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PTX-072	bill/5905/text?s=1&r=76 "1948 Presidential General Election			
Γ1 Λ- 0/2	Results." US Election Atlas.Org. Dave			
	Leip's Election Atlas, Accessed			
	August 19, 2023.			
	https://uselectionatlas.org/RESULTS/n			
	ational.php?year=1948			
PTX-073	"1964 Presidential General Election			
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	August 19, 2023.			
	https://uselectionatlas.org/RESULTS/n			
	ational.php?year=1964			
PTX-074	"1968 Presidential General Election			
	Results." US Election Atlas.Org. Dave			
	Leip's Election Atlas, Accessed			
	August 19, 2023.			
	https://uselectionatlas.org/RESULTS/d			
	ata.php?year=1968&datatype=national			
DEST OF S	&def=1&f=0&off=0&elect=0			
PTX-075	Tilley, Brian P. 2020. "I Am the Law			
	and Order Candidate": A Content			
	Analysis of Donald Trump's Race-			

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	Baiting Dog Whistles in the 2016 Presidential Campaign, Psychology 11 (pp. 1941-1974).			
PTX-076	Schaffner, Brian F., Matthew Macwilliams, and Tatishe Nteta. 2018. "Understanding White Polarization in the 2016 Vote for President: The Sobering Role of Racism and Sexism," Political Science Quarterly, 133 (1): 9- 34.			
PTX-077	Valentino, Nicholas A., Fabian G. Neuner, and Matthew Vandenbroek. 2018. "The Changing Norms of Racial Political Rhetoric and the End of Racial Priming," The Journal of Politics 80 (3): 757-771.			
PTX-078	Mutz, Diana C. "Status threat, not economic hardship, explains the 2016 presidential vote," Proceedings of the National Academy of Sciences, 115 (19) E4330-E4339.			
PTX-079	"Senate Bill 2113." LegiScan. LegiScan, April 30, 2021. https://legiscan.com/MS/text/SB2113/i d/2546132			
PTX-080	Schaeffer, Katherine. "More than Half of States Will Recognize Juneteenth as an Official Public Holiday in 2023." Prewresearch.Org. Pew, June 9, 2023. https://www.pewresearch.org/short-reads/2023/06/09/more-than-half-of-states-now-recognize-juneteenth-as-an-official-holiday/			
PTX-081	DeeDee Baldwin, Mississippi History Now, "The First Black Legislators in Mississippi," https://mshistorynow.mdah.ms.gov/issue/first-black-legislators-mississippi			
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	PTX-084	Statistics of the Presidential and Congressional Election of November 2, 1948. Office of the Clerk of the House of Representatives. Retrieved November 5, 2023, from https://clerk.house.gov/member_info/electionInfo/1948election.pdf			
	PTX-085	Tasha S. Philpot, Daron R. Shaw & Ernest B. McGowen, Winning the Race: Black Voter Turnout in the 2008 Presidential Election, Public Opinion Quarterly, Volume 73, Issue 5, 2009, Pages 995–1022			
	PTX-086	Seth McKee, M. Hood, & David Hill. (2012). Achieving Validation: Barack Obama and Black Turnout in 2008. State Politics & Policy Quarterly, 12(1), 3-22.			
	PTX-087	Jacob R. Brown, 2023. The Obama effect? Race, first-time voting, and future participation. Political Science Research and Methods, 1-18.			
26	PTX-088	2008 Mississippi Presidential Election Results: https://www.sos.state.ms.us/elections/2 008/08%20Certification%20Results/C ertifiedMain.asp			X
)	PTX-089	2012 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionres ults/2012General/certified%20results/ President%20and%20Vice%20Preside nt.pdf			X
. ملا	PTX-090	2016 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2016General/Statewide%20Certified%20Results/President%20and%20Vice%20President.pdf			X

	Ex. No.	Document Description	Sponsor	ID.	EVID.
	PTX-091	2020 Mississippi Presidential Election			
	1174 071	Results:			
	- 1	https://sos.ms.gov/elections/electionres			V
226	2024	ults/2020General/Statewide%20Certifi			
	•	ed%20Results/President%20and%20V			•
		ice%20President_AMENDED.pdf.			
	PTX-092	Exhibit 6 of Deposition of Madalan			\ \ .
2-26	-2024	Lennep, True the Vote v. Hosemann			X
-		Declaration, MLC25			
	PTX-093	Exhibit 7 of Deposition of Madalan			_
2-20	1-2024	Lennep, Thomas v. Bryant Declaration, MLC34			X
	PTX-094	Exhibit 8 of Deposition of Madalan			
	1 171-074	Lennep, Election Commissioner			
2-26	-2024	Orientation Slide Decks, MLC07,			\
	•	MLC13, MLC26, MLC30			
	PTX-095	Exhibit 10 of Deposition of Madalan			
2-26	-2024	Lennep, Voter Roll Move, Merge, and			X
	•	Purge, MLC28			
	PTX-096	Exhibit 11 of Deposition of Madalan			\/
2-26	-2024	Lennep, ECAM Meeting Slide Decks, MLC10, MLC17, MLC29			X
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-	PTX-099	Exhibit 18 of Deposition of Madalan			
	Γ1Λ - 099	Lennep, Email with Booth and Lennep			\/
2-26	-2024	re:			X
		Reports, 1/15/19, REL0000000069			′ \
		INTENTIONALLY LEFT BLANK			
-	PTX-101	Exhibit 22 of Danasition of Madelan			
2.3		Exhibit 22 of Deposition of Madalan Lennep, Emails with Collins and			Y
3-36-	2024	Lennep re:			\
		Conference Call, 12/15/20,			
		MS00000337			
	PTX-102	Exhibit 25 of Deposition of Madalan			
2-21	-2024	Lennep, Emails with Collins and			X
	wet	Lennep re:			' ' '
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2-24	PTX-105	Exhibit 28 of Deposition of Madalan Lennep, Emails with Collins and Lennep re:			X
- OLY	- 2024 -	2019 Gov Race, 6/16/21, MS00000338 INTENTIONALLY LEFT BLANK			
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2-2(PTX-109	Exhibit 33 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: County Turnout Data, 7/20/21, MS00000002			X
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22	PTX-114	Exhibit 38 of Deposition of Madalan Lennep, Clarion-Ledger Article, MLC15			X
2-2	PTX-115	Deposition Transcript of Kyle Kirkpatrick, Esq., taken on December 20, 2023			X
2-2	PTX-116 (- 2024 PTX-117	Exhibit 3 of Deposition of Kyle Kirkpatrick, Esq., Email to Ben Collins from Madalan Lennep re: Letter is Delivered			X
22	PTX-117 2024	Exhibit 4 of Deposition of Kyle Kirkpatrick, Esq., Election Commissioner Orientation: Introduction to the Statewide Elections Management System (SEMS)			χ
2×10-	PTX-118	Exhibit 5 of Deposition of Kyle Kirkpatrick, Esq., SEMS Update – ECAM Convention 2011			X
2-24	PTX-119	Mississippi Code Annotated §§ 23-15-359, 23-15-851; 23-15-833; 23-15-837			X
	PTX-120	Associated Press, Special Election Delayed to Fill Mississippi House Seat			/\

	Ex. No.	Document Description	Sponsor	ID.	EVID.
		1			
	PTX-121	Order Dispensing With Special			
	DTV 122	Election, September 14, 2021			
	PTX-122	Sample Ballot, 2020 HD 88 Special Election			
	PTX-123	Election Results, 2021 Special			
	1 171 123	Elections to the Mississippi Senate			
	PTX-124	Associated Press, Democrat Abe			
		Hudson resigning from Mississippi			
		House			
	PTX-125	Writ of Election as to Senate District			
		32, July 14, 2021			
	PTX-126	Enacted Senate District 2 with			
	PTX-127	Precincts Demographic Transport of Modeler			
2-26	3014	Deposition Transcript of Madalan Lennep, taken on December 18, 2023			X
	PTX-128	Marvin King CV			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
2-29		Trial vini Trinig O v	De. Marvin King De. Robert Luckett		
	PTX-129	Robert E. Luckett, Jr. CV	00 101 11		\/
2-27-2	•		TR. KODER LUCLETT		X
	PTX-130	Nairne v Ardoin, 3:22-cv-00178-SDD-	•	V	
3-6-1	024	SDJ, Doc. 233, Ruling and Order			
		(excerpts)			
	PTX-131	2020 Special Election Results – HD 88, SD 15, SD 39, HD 37, HD 66			
	PTX-132	2020 Special Elections Sample Ballot			
	1 1 /X-1 J Z	2020 Special Elections Sample Banot			
	PTX-133	Clarion Ledger, Governor sets special			
		elections in November to fill 2 empty			
		seats in Mississippi Senate			
	PTX-134	Enterprise Tocsin, Abe Hudson			
		Resigns from House Seat, Special			
	DTV 125	Election Set for Nov. 2			
	PTX-135	Clarion Ledger, Mississippi Voters Head to Polls Tuesday to Fill Four			
		Open Legislative Seats			
	PTX-136	Deposition Transcript of Dr. Thomas		V	
36-	2024	Brunell			
	PTX-147	Secretary of State of Mississippi,		١.	
21	1001	Voter Registration Drive Organizer		X	
2-6	-1024	Toolkit (Nov. 2021)		/ `	
	PTX-148	U.S. News, Mississippi voter			
		registration numbers remain steady			
3-6	-1024	heading into Tuesday's general election (Nov. 2, 2023),			
		https://apnews.com/article/election-			
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	Ex. No.	Document Description	Sponsor	ID.	EVID.
		2023-mississippi-voter-registration- a4bd134bda9f9063d56952c6f3454706			
3-6	PTX-155	U.S. Census Bureau, <i>Increased Margins of Error in the 5-Year Estimates Containing Data Collected in 2020</i> , https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2022-04.html		X	
36.	PTX-156	Deposition Transcript of Dr. John Alford		X	